

Todd M. Friedman, Esq. (SBN 216752)
Arvin Ratanavongse, Esq. (SBN 257619)
LAW OFFICES OF TODD M. FRIEDMAN, P.C.
324 South Beverly Drive, Suite 725
Beverly Hills, CA 90212
Phone: 877-206-4741
Fax: 866-633-0228
tfriedman@attorneysforconsumers.com
aratanavongse@toddfllaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

FLORENCIO PACLEB,)	Case No. 2:15-cv-08286-SJO-PJW
INDIVIDUALLY AND ON BEHALF)	
OF ALL OTHERS SIMILARLY)	NOTICE OF VOLUNTARY
SITUATED,)	DISMISS PLAINTIFF'S CLAIMS
)	WITH PREJUDICE AND TO
Plaintiff,)	DISMISS THE CLAIMS OF THE
)	PUTATIVE CLASS WITHOUT
vs.)	PREJUDICE
)	
SECURE ONE CAPITAL)	
CORPORATION; ROOVEN AKIBA;)	
AND DOES 1 THROUGH 10,)	
INCLUSIVE, AND EACH OF THEM,)	
)	
Defendants.)	
)	

NOTICE IS HEREBY GIVEN that Plaintiff, pursuant to Federal Rule of Civil Procedure 41(a)(1), hereby voluntarily dismisses the entire case with prejudice as to the individual claims and without prejudice as to the putative class claims. Each party shall bear their own costs and fees. Defendant has neither

1 answered Plaintiff's Complaint, nor filed a motion for summary judgment.

2 Accordingly, this matter may be dismissed without an Order of the Court.
3

4
5 Dated: January 6, 2016 **LAW OFFICES OF TODD M. FRIEDMAN, P.C.**
6

7 By: /s/ Todd M. Friedman
8 Todd M. Friedman, Esq.
9 Arvin Ratanavongse, Esq.
10 Attorneys for Plaintiff
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Filed electronically on this 6th day of January, 2016, with:

2 United States District Court CM/ECF system
3

4 And hereby served upon all parties

5 Notification sent on this 6th day of January, 2016, via the ECF system to:

6
7 Honorable Judge S. James Otero
8 Judge of the United States District Court
9 Northern District of California

10 **Arvin Ratanavongse**
11 Law Offices of Todd M Friedman PC
12 Email: aratanavongse@toddflaw.com

13 Copy sent via mail on this 6th day of January, 2016, to:

14 Attorney for Defendant
15 Debbie Kirkpatrick, Esq.
16 Sessions Fishman Nathan & Israel, LLC
17 1545 Hotel Circle South, Suite 150
18 San Diego, CA 92108

19 By: s/Todd M. Friedman
20 Todd M. Friedman
21
22
23
24
25
26
27
28